

**Before the Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of:	)	
	)	
Petition For Forbearance From E911	)	WT Docket No. 02-377
Accuracy Standards Imposed On Tier	)	
III Carriers	)	

COMMENTS OF:  
Larry B. Simmons  
On-Board Communications, Inc.

On-Board Communications acknowledges the challenges facing Tier III carriers in their attempt to meet current Phase II-compliant E911 location requirements. Granting forbearance to the existing requirements without investigating alternative location technologies may be premature. Carriers have focused on network or phone based location solutions without regard to alternative technologies. Since the inception of the FCC Phase II guidelines in 1996<sup>1</sup>, a number of solutions have emerged which are independent of the carrier's network. Further, some of these solutions operate with both legacy and future cellular telephones regardless of the wireless protocol.

Public Safety Answering Points in rural areas experience similar challenges, finding the financial and human resources to upgrade systems to support Phase II wireless E911<sup>2</sup>. Some alternative solutions may enable a PSAP to receive location information without modification to existing PSAP infrastructure.

With recent world happenings, Americans are increasingly concerned with safety and security. Enforcing the Phase II wireless E911 mandate is in the best interest of every citizen. It would not be in the public interest to forbear this mandate for Tier III carriers until all alternative means of providing wireless location information are exhausted.

Respectfully submitted,

Larry B. Simmons  
On-Board Communications  
5949 Sherry Lane Suite 625  
Dallas, TX 75225  
Phone 615-599-1870  
Fax 615-591-1850  
Email larrybsimmons@on-boardcommunications.com

---

<sup>1</sup> CC Docket No. 94-102 June 12, 1996 FCC ADOPTS RULES TO IMPLEMENT ENHANCED 911 FOR WIRELESS SERVICES

<sup>2</sup> "A Report on Technical and Operational Issues Impacting the Provision of Wireless E911 Services", Dale N. Hatfield